West Virginia Department of Environmental Protection
Division of Air Quality

Joe Manchin, III
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:
Mittal Steel USA - Weirton Inc.
R30-02900001-2006 (Part 2 of 3)

John A. Benedict
Director

Issued: August 21, 2006 • Effective: September 21, 2006
Expiration: August 21, 2011 • Renewal Application Due: February 21, 2006

Permit Number: **R30-02900001-2006 (Part 2 of 3)**
Permittee: **Mittal Steel USA - Weirton Inc.**
Mailing Address: **400 Three Springs Drive Weirton, WV 26062-4989**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Weirton, Hancock County, West Virginia
Mailing Address: 400 Three Springs Drive Weirton, WV 26062-4989
Telephone Number: 304-797-2000
Type of Business Entity: Corporation
Facility Description: Steel Mill
SIC Codes: 3312
UTM Coordinates: 533.70 km Easting • 4474.50 km Northing • Zone 17

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
		STRIP MILL			
033/1	S100	Reheat Furnace 1	1991	350 tons/hr	None
034/1	S101	Reheat Furnace 2	1991	350 tons/hr	None
037/1	F104	Hot Strip Mill	1929	500 tons/hr	None
037/4	F711	Hot Strip Mill Cooling Tower	1930	N/A	None
0E6/1	F706	Hot Strip Mill WWTP	1970s	N/A	None
038/3	S105A, S105B	No. 3 Pickle Line - Idled	1940	175 tons/hr	Fume Scrubber
038/4	F105	No. 3 Pickle Line Oil Coating - Idled	1940	175 tons/hr	None
039/3	S106, S124	No. 5 Pickle Line	1975	310 tons/hr	Fume Scrubber
039/4	F106	No. 5 Pickle Line Oil Coating	1975	310 tons/hr	None
HCL-R HCL-S	F125 F126	Strip Steel HCl Acid Storage Tanks	N/A	15,000 gallons	Scrubber
040/1	S107	No. 7 Tandem Mill - Idled	1955	100 tons/hr	Fume exhaust & cleaning system
041/1	F108	No. 8 Tandem Mill	1958	100 tons/hr	None
042/1	S109A, S109B S109C, S109D S109E	No. 9 Tandem Mill	1975	150 tons/hr	Fume exhaust & cleaning system
044/1	F112	No. 8 Skin Mill	1956	100 tons/hr	None
045/1	S113A, S113B S113C, S113D	Strip Steel Batch Annealing Furnaces (17) 2.5 mmBtu/hr each - Idled	1955	42.5 mmBtu/hr	None
		ACID PLANT			
046/2	S114	HCl Regeneration Unit 1 - Idled	1974	6.56 tons/hr	Scrubber C114
047/2	S115	HCl Regeneration Unit 2	1974	6.56 tons/hr	Scrubber C115
048/2	S116	HCl Regeneration Unit 3	1974	6.56 tons/hr	Scrubber C116
049/2	S117	HCl Regeneration Unit 4	1974	6.56 tons/hr	Scrubber C117
HCL-A through H	Stack	HCL Storage Tanks (8)	1996	30,000 gallons each	Scrubber
		SHEET MILL			
052/2	S202 S202A	Galvanize Line 3 - Idled Alkaline Cleaning Exhaust	1956	80.5 mmBtu/hr	N/A
053/2	S203 S203A	Galvanize Line 4 - Idled Alkaline Cleaning Exhaust	1956	56.5 mmBtu/hr	N/A

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
054/2	S204 S204A	Galvanize Line 5 Alkaline Cleaning Exhaust	1966	69.0 mmBtu/hr	N/A
		TIN MILL			
056/1	S300	Jumbo Anneal 1-4 (East); 10 mmBtu/hr each	1942	40 mmBtu/hr	None
057/1	S301	Jumbo Anneal 5-8 (Middle); 10 mmBtu/hr each	1948	40 mmBtu/hr	None
058/1	S301	Jumbo Anneal 9-12 (West); 10 mmBtu/hr each	1956	40 mmBtu/hr	None
059/2	S302, S303	Tin Mill Cleaning Lines (2) Nos. 3 & 4	1938	N/A	None
060/1	S304 S304A	Continuous Annealing Line 1 Alkaline Cleaning Exhaust	1957	96.0 mmBtu/hr	None
061/1	Inside bldg. S305	Continuous Annealing Line 2 Alkaline Cleaning Exhaust	1961	96.0 mmBtu/hr	None
062/1	S306 S306A	Continuous Annealing Line 3 Alkaline Cleaning Exhaust	1970	96.0 mmBtu/hr	None
063/1	F307	No. 1 Weirlite Temper Mill	1962	80 tons/hr	None
064/1	F308	No. 2 Weirlite Temper Mill	1965	100 tons/hr	None
065/1	N/A	No. 4 Temper Mill	1955	120 tons/hr	None
066/1	N/A	No. 5 Temper Mill	1969	120 tons/hr	None
072	S316 S328 S329	No. 1 Zinc Plating Line - Plating Cleaning Pickling, Chemical Surface Treatment	1943	60 tons/hr	None
073	S317 S330	No. 2 Chrome Plating Line - Plating Cleaning and Pickling	1943/ 1966	60 tons/hr	Scrubbers C317 & C330
074	S318 S332 S334	No. 4 Tin Plating Line - Plating Cleaning and Pickling Chemical Surface Treatment	1950	40 tons/hr	Scrubbers C332, & C334
075	S319 S335 S336 S338	No. 5 Tin/Chrome Plating Line - Plating - Idled Plating Cleaning and Pickling Chemical Surface Treatment	1956	60 tons/hr	Scrubbers C319, C335, C336, & C338
076	S320 S339 S341	No. 6 Tin Plating Line - Plating Cleaning and Pickling Chemical Surface Treatment	1965	50 tons/hr	Scrubbers C320, C339, & C341
077/2 077/3	S326 S327	Roll Shot Blaster 1 Roll Shot Blaster 2	1950 1965	24,000 lbs/hr each	Baghouse C326 Baghouse C327
078/1, 078/2 078/3	S322 6 stacks	Anode Shop Melting Pots (3)	1943	5 mmBtu/hr each	N/A

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NAAQS**	National Ambient Air Quality Standards
CBI	Confidential Business Information	**NESHAPS**	National Emissions Standards for Hazardous Air Pollutants
CEM	Continuous Emission Monitor	**NO_x**	Nitrogen Oxides
CES	Certified Emission Statement	**NSPS**	New Source Performance Standards
C.F.R. *or* CFR	Code of Federal Regulations	**PM**	Particulate Matter
CO	Carbon Monoxide	**PM_{10}**	Particulate Matter less than 10µm in diameter
C.S.R. *or* CSR	Codes of State Rules	**pph**	Pounds per Hour
DAQ	Division of Air Quality	**ppm**	Parts per Million
DEP	Department of Environmental Protection	**PSD**	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	**psi**	Pounds per Square Inch
HAP	Hazardous Air Pollutant	**SIC**	Standard Industrial Classification
HON	Hazardous Organic NESHAP	**SIP**	State Implementation Plan
HP	Horsepower	**SO_2**	Sulfur Dioxide
lbs/hr	Pounds per Hour	**TAP**	Toxic Air Pollutant
LDAR	Leak Detection and Repair	**TPY**	Tons per Year
M	Thousand	**TRS**	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	**TSP**	Total Suspended Particulate
MM	Million	**USEPA**	United States Environmental Protection Agency
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour	**UTM**	Universal Transverse Mercator
MMCF/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour	**VEE**	Visual Emissions Evaluation
NA	Not Applicable	**VOC**	Volatile Organic Compounds

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

2.11.3. A permitted source may trade increases and decreases in emissions within the facility, where rules promulgated by the Secretary pursuant to provisions of Title I of the Clean Air Act and which are contained in the State Implementation Plan for West Virginia provide for such emissions trades without a permit modification. In such a case, the advance written notice provided by the permittee shall identify the applicable requirements allowing trading and shall state when the change will occur, the types and quantities of emissions to be traded, the permit terms or other applicable requirements with which the source will comply through emissions trading, and such other information as may be required by the Secretary.

[45CSR§30-5.8.b.]

2.11.4. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.5. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. **[45CSR§30-2.39]**

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution Control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and

variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, issued pursuant to 45CSR30, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary, in acting on the permit application or revision, has determined in writing that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

3.0. Facility-Wide Requirements for Part 2 of Facility

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health.
[40 C.F.R. 61 and 45CSR15]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.9. The permittee shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2.]

3.2. Monitoring Requirements

None.

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15), 45CSR§7-8.1. and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.
[45CSR§30-5.1.c.2.A.]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class, or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate in writing:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. None

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. Permit R13-1137, Specific Requirement A.4. required the permittee to discontinue operations of the two (2) existing vintage slab reheating furnaces, No. 3 and No. 4, upon commencement of operation of the new No. 2 walking beam slab reheating furnace. Permit R13-1310, Specific Requirement A.4. required the permittee to discontinue operations of the two (2) existing vintage slab reheating furnaces, No. 1 and No. 2, upon commencement of operation of the new No. 1 walking beam slab reheating furnace. These requirements have been complied with and were not included in the Title V permit.

b. Permits R13-1137 and R13-1310, Specific Condition A.7. requires SO_2 emission limitations upon commencement of operation of the Struthers Corporation's Browns Island coke oven battery. The coke oven battery was never constructed, therefore this requirement was not included in the Title V permit.

c. Civil Consent Decree 5-96-CV-171 - has been terminated in accordance with Section XXXVIII.B. The permittee has certified completion and compliance with all requirements.

d. 40 CFR 60, subparts K, Ka, and Kb - The storage tanks associated with the Cold Side of the facility are not subject to these subparts. The 6 million gallon fuel oil tank, OB6/1, is the only tank constructed within the time frames, however, its true vapor pressure is 0.0002 psia and it is thus exempt from 40 C.F.R. Subpart K in accordance with 40 C.F.R.§ 60.113(d)(1).

e. 40 CFR 63 Subpart N - NESHAPs for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. Continuous chromium electroplating of steel is different from the chromium electroplating operations regulated in the existing NESHAP standard. Therefore, chromium electroplating operations at Mittal Steel USA - Weirton Inc. are not applicable to 40 CFR 63 Subpart N.

f. 40 CFR 63 Subpart Q - NESHAP for Industrial Process Cooling Towers. No chromium-based water treatment chemicals are used at the facility.

g. 40 CFR 63 Subpart T - National Emissions Standards for Halogenated Solvent Cleaning. No halogenated solvent cleaning machines exist at the facility.

h. A Permit Determination form, dated December 10, 2002, and received by this Office on December 12, 2002 was submitted for the installation of a Polymer coating line. No permit was required based on information received in the Permit Determination form.

4.0. Direct Fired Combustion Source Requirements [Reheat Furnaces 1 and 2]

4.1. Limitations and Standards

4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except for smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§§7-3.1. and 3.2.]

4.1.2. No person shall circumvent the provisions of 45CSR7 by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.
[45CSR§7-4.3.]

4.1.3. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.
[45CSR§7-4.12.]

4.1.4. No owner or operator shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
[45CSR§10-11.1.]

4.1.5. In accordance with the permit application and its amendments, emissions from the stacks venting the Reheat Furnaces (Emission Point IDs S100 and S101) shall not exceed the following limitations:

Pollutant	No. 1 Reheat Furnace (S100)	No. 2 Reheat Furnace (S101)
Particulate Matter	64.7 pph	64.7 pph
PM_{10}	60.7 pph	60.7 pph
CO	35.9 pph	40.0 pph
NO_x	232.0 pph	232.0 pph
VOC	4.0 pph	4.0 pph

Compliance with the PM limit shall demonstrate compliance with the less stringent limitations of 45CSR§7-4.1.
[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.1. and 45CSR§7-4.1.]

4.1.6. In accordance with the permit application and its amendments, emissions of sulfur dioxide (SO_2) from the stacks venting the No. 1 and No. 2 Reheat Furnaces (Emission Points ID S100 and S101) shall not exceed 882.9 lb/hr each or a 2,000 ppm stack concentration, whichever is the more stringent limitation. Compliance with the allowable sulfur dioxide concentration limitations shall be based on a block three (3) hour averaging time.
[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.2. and 45CSR§§10-4.1. and 4.2.]

4.1.7. In accordance with the permit application and its amendments, the No. 1 and No. 2 Reheat Furnaces shall not process more than 350 ton/hr of product nor consume more than 421.9 x 10^6 Btu/hr. In the event that the company can demonstrate through appropriate stack testing that the furnace can process more than 350 ton/hr

without increasing emissions above those listed in Sections 4.1.5. and 4.1.6. of this permit, or consuming more than 421.9 x 10^6 Btu/hr, the company may be allowed to process up to 400 ton/hr.
[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.3.]

4.1.8. Annual SO_2 emissions from the No. 1 Reheat Furnace shall not exceed 1281 ton/yr. Annual SO_2 emissions from the No. 2 Reheat Furnace shall not exceed 1454 ton/yr.
[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.5.]

4.1.9. Annual NO_x emissions from the No. 1 Reheat Furnace shall not exceed 826 ton/yr. Annual NO_x emissions from the No. 2 Reheat Furnace shall not exceed 831 ton/yr.
[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.6.]

4.1.10. The permittee agrees to comply with the following SO_2 control requirements: Hot Mill Reheat Furnaces shall be limited to firing only natural gas and mixed gas (comprised of approximately 70% natural gas and 30% air).
[CO-SIP-C-2003-28, Condition IV.3.(h)]

4.2. Monitoring Requirements

4.2.1. None

4.3. Testing Requirements

4.3.1. For the purpose of determining compliance with the provisions of R13-1137 and R13-1310 by stack testing, the following test methods referring to Appendix A Part 60 of the Code of Federal Register shall apply. Recognizing that stack test technology is an ever changing one, the Director may require a different method or may approve an alternative method proposed by the company. In any such case, the method should not result in a decreased emission rate in comparison to the specified method.

Particulate Matter	Method 5 (and 45CSR7A)
PM_{10}	Methods 201 and 201A
Sulfur Dioxide	Method 6A, 6B or 6C
Carbon Monoxide	Method 10
Nitrogen Oxide	Method 7 or 7A
Non-methane hydrocarbons	Method 25 or 25A

[45CSR13, R13-1137 and R13-1310, Other Requirement B.]

The following test methods are also acceptable to demonstrate compliance:

PM_{10}	Method 202
Sulfur Dioxide	Method 8
Nitrogen Oxide	Method 7E

[45CSR§30-5.1.c.]

4.4. Recordkeeping Requirements

4.4.1. For the purposes of calculating annual [calendar year] NO_x emissions as required by Sections 4.1.9. of this permit, the following formula shall be utilized:

$$NO_x \text{ (tons)} = [\text{ft}^3 \text{ of NG consumed}] + [\text{ft}^3 \text{ of MG consumed}] \times 0.7 \text{ ft}^3 \text{ NG/ft}^3 \text{ MG}$$

$$\times \frac{280 \text{ lbm } NO_x}{10^6 \text{ ft}^3 \text{ natural gas}} \times \frac{1 \text{ ton}}{2000 \text{ lbm}}$$

Where: NG = Natural Gas and MG = Mixed Gas

[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.6.]

4.4.2. In order to demonstrate compliance with the NO_x emissions limit as set forth in Section 4.1.5., the permittee shall calculate the hourly emissions by dividing the results of the monthly calculation performed for Section 4.5.1. by the number of hours of operation of the reheat furnaces that month.
[45CSR§30-5.1.c.]

4.5. Reporting Requirements

4.5.1. For purposes of tracking compliance with the annual limitation of 831 ton/yr for No. 2 walking beam slab reheating furnace and 826 ton/yr for the No. 1 walking beam slab reheating furnace, total NO_x emissions shall be reported to the WVDAQ on a monthly basis with subject report filed by the 30th day of the following month.
[45CSR13 - R13-1137 and R13-1310, Specific Requirement A.6.]

4.6. Compliance Plan

4.6.1. None

5.0. Indirect Fired Fuel Burning Units Requirements [Strip Steel Batch Annealing Furnaces, Galvanize Lines 3, 4, and 5, Jumbo Anneals 1-4, 5-8, 9-12, Continuous Annealing Lines, Anode Melting Shop Pots]

5.1. Limitations and Standards

5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR§2-3.1.]**

5.1.2. No person shall cause, suffer, allow or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:

Emission Unit ID	Description	PM limit
052/2, 053/2, 054/2	Galvanize Lines 3 - Idled, 4 - Idled, and 5	55.26 pph
056/1, 057/1, 058/1	Jumbo Anneals 1-4 (East), 5-8 (Middle), and 9-12 (West)	
060/1, 061/1, 062/1	Continuous Annealing Lines 1, 2, and 3	

[45CSR§§2-4.1., 4.1.b., and 4.3.]

5.1.3. The visible emission standards set forth in Section 5.1.1. of this permit shall apply at all times except in periods of start-ups, shutdowns and malfunctions.
[45CSR§2-9.1. (Strip steel batch annealing furnaces and anode melting shop pots exempt)]

5.1.4. At all times, including periods of start-ups, shutdowns and malfunctions, the permittee shall, to the extent practicable, maintain and operate any fuel burning units including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.
[45CSR§2-9.2. (Strip steel batch annealing furnaces and anode melting shop pots exempt)]

5.1.5. No person shall cause, suffer, allow or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:

Emission Unit ID	Description	SO_2 limit
052/2, 053/2, 054/2	Galvanize Lines 3 - Idled, 4 - Idled, and 5	1903.4 pph
056/1, 057/1, 058/1	Jumbo Anneals 1-4 (East), 5-8 (Middle), and 9-12 (West)	
060/1, 061/1, 062/1	Continuous Annealing Lines 1, 2, and 3	

[45CSR§10-3.1.e.]

5.1.6. No person shall circumvent the provisions of 45CSR10 by constructing fuel burning unit(s) larger than would be necessary to provide heat and/or power for an existing manufacturing plant, with a reasonable margin for plant expansion, in order to use that design heat input to raise the allowable sulfur content in fuel.
[45CSR§10-3.6. (Strip steel batch annealing furnaces and anode melting shop pots exempt)]

5.1.7. No owner or operator shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. **[45CSR§10-11.1.]**

5.1.8. The permittee agrees to comply with the following SO_2 control requirements: Annealing Furnaces shall be limited to firing only natural gas and mixed gas (comprised of approximately 70% natural gas and 30% air). **[CO-SIP-C-2003-28, Condition IV.3.(h)]**

5.2. Monitoring Requirements

5.2.1. None

5.3. Testing Requirements

5.3.1. None

5.4. Recordkeeping Requirements

5.4.1. None

5.5. Reporting Requirements

5.5.1. None

5.6. Compliance Plan

5.6.1. None

6.0. Manufacturing Process Source Requirements [Hot Strip Mill, Tandem Mills, Skin Mill, Temper Mills, Weirlite Temper Mills, and Plating Lines]

6.1. Limitations and Standards

6.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except for smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§§7-3.1. and 3.2.]

6.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified in the table below:

Emission Unit ID	Description	PM Limit (pph)
077/2	Roll Shot Blaster 1	18.4
077/3	Roll Shot Blaster 2	15.2

[45CSR§§7-4.1. and 4.4.]

6.1.3. Where more than one source operation or combinations thereof, which are part of a duplicate source operation, are vented through separate stacks, the allowable stack emission rates for the separate stacks shall be determined by the following formula:

$$R_s = R_t \left(\frac{W_s}{W_t} \right)$$

Where,
R_s is the allowable stack emission rate for the separate stack venting the source operation(s) in question;
R_t is the total allowable emission rate for the duplicate source operation;
W_s is the operating process weight rate for the source operation(s) vented through the separate stack; and
W_t is the total operating process weight rate for the duplicate source operation.
[45CSR§7-4.8.]

6.1.4. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.
[45CSR§7-4.12.]

6.1.5. No person shall cause, suffer, allow or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.]

6.2. Monitoring Requirements

6.2.1. Visual emission checks of each emission point subject to an opacity limit in Sections 6.1.1. and 6.1.2. shall be conducted once per week during periods of normal facility operation using 40 C.F.R. 60 Appendix A, Method 22. If during these checks, or at any other time, visible emissions are observed at any emission point subject to an opacity limit, compliance shall be determined by conducting tests in accordance with the methodology set forth in 45CSR7A-2 "Compliance Test Procedures for 7A." If no visible emissions are observed after one month, visible emission checks shall be conducted monthly. If any visible emissions are observed during the monthly emission checks, visible emission checks shall return to being performed weekly. If no visible emissions are observed after four months, visible emission checks shall be conducted each calendar quarter. If any visible emissions are observed during the quarterly emission checks, visible emission checks shall return to being performed each calendar month as noted above.
[45CSR§30-5.1.c.]

6.3. Testing Requirements

6.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
[45CSR§§7-8.1. and 8.2.]

6.4. Recordkeeping Requirements

6.4.1. Records of the visible emission checks conducted in accordance with Section 6.2.1. of this permit shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22, or 45CSR7A, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

6.5. Reporting Requirements

6.5.1. None

6.6. Compliance Plan

6.6.1. None

7.0. Storage Structure Requirements [Lime Storage Silos]

7.1. Limitations and Standards

7.1.1. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 45CSR§7-5.1 is required to have a full enclosure and be equipped with a particulate matter control device.
[45CSR§7-3.7.]

7.1.2. No person shall cause, suffer, allow or permit any storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.]

7.2. Monitoring Requirements

7.2.1. The permittee shall monitor the PM emissions by conducting visible emissions checks in accordance with Section 6.2.1. of this permit
[45CSR§30-5.1.c.]

7.3. Testing Requirements

7.3.1. None

7.4. Recordkeeping Requirements

7.4.1. Records of the visible emission checks conducted in accordance with Section 7.2.1. of this permit shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22, or 45CSR7A, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

7.5. Reporting Requirements

7.5.1. None

7.6. Compliance Plan

7.6.1. None

8.0. Pickling Lines and HCl Regeneration Units Requirements: 40 CFR Part 63, Subpart CCC (Steel Pickling – HCl Process MACT)

8.1. Limitations and Standards

8.1.1. Potential Hazardous Material Emissions--Persons responsible for manufacturing process source operations from which hazardous particulate matter material may be emitted such as, but not limited to, lead, arsenic, beryllium and other such materials shall give the utmost care and consideration to the potential harmful effects of the emissions resulting from such activities. Evaluations of these facilities as to adequacy, efficiency and emission potential will be made on an individual basis by the Director working in conjunction with other appropriate governmental agencies.
[45CSR§7-4.13.]

8.1.2. a. *Pickling lines.* No owner or operator of an existing affected continuous or batch pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line any gases that contain HCl in a concentration in excess of 18 parts per million by volume (ppmv) or HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent. Compliance with this limit shall demonstrate compliance with the less stringent limitation of 45CSR§7-4.2.

b. *Hydrochloric acid regeneration plants.* 1. No owner or operator of an existing affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain HCl in a concentration greater than 25 ppmv.

2. No owner or operator of an existing affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain chlorine (Cl_2) in a concentration in excess of either 6 ppmv or an alternative source-specific maximum concentration. The source-specific maximum concentration standard shall be established according to Section 8.2.1.c.2. of this permit.

[40 C.F.R. § 63.1157, 45CSR34 and 45CSR§7-4.2]

8.1.3. a. *Hydrochloric acid regeneration plant.* The permittee must operate the affected plant at all times while in production mode in a manner that minimizes the proportion of excess air fed to the process and maximizes the process offgas temperature consistent with producing usable regenerated acid or iron oxide.

b. *Hydrochloric acid storage vessels.* The permittee shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

[40 C.F.R. § 63.1159 and 45CSR34]

8.1.4. a. The permittee shall comply with the operation and maintenance requirements prescribed under 40 C.F.R. §63.6(e).

b. The permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan is hereby incorporated by reference into the source's Title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

i. Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;

ii. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;

iii. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;

iv. Require an inspection of each scrubber at intervals of no less than 3 months with:

A. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;

B. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;

C. Repair or replacement of droplet eliminator elements as needed;

D. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and

E. Adjustment of damper settings for consistency with the required air flow.

v. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.

vi. The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of this subpart.

vii. The owner or operator shall maintain a record of each inspection, including each item identified in Section 8.1.4.b.iv. of this permit, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

c. The owner or operator of each hydrochloric acid regeneration plant shall develop and implement a written maintenance program. The program shall require:

i. Performance of the manufacturer's recommended maintenance at the recommended intervals on all required systems and components;

ii. Initiation of procedures for appropriate and timely repair, replacement, or other corrective action within 1 working day of detection; and

iii. Maintenance of a daily record, signed by a responsible maintenance official, showing the date of each inspection for each requirement, the problems found, a description of the repair, replacement, or other action taken, and the date of repair or replacement.

[40 C.F.R. § 63.1160(b) and 45CSR34]

8.2. Testing requirements

8.2.1. a. *Demonstration of compliance.* The permittee shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements in 40 C.F.R §63.7 and in this section.

1. Following approval of the site-specific test plan, the permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device (to determine compliance with the applicable collection efficiency standard) or measure the concentration of HCl (and Cl_2 for hydrochloric acid regeneration plants) in gases exiting the process or the emission control device (to determine compliance with the applicable emission concentration standard).

2. Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

3. Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl or Cl_2 exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.

b. *Establishment of scrubber operating parameters.* During the performance test for each emission control device, the permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The permittee shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per paragraph a.2. of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

c. *Establishment of hydrochloric acid regeneration plant operating parameters.*

1. During the performance test for hydrochloric acid regeneration plants, the permittee shall establish site-specific operating parameter values for the minimum process offgas temperature and the maximum proportion of excess air fed to the process as described in Section 8.3.1.b.1. of this permit. During the emission test, each operating parameter must be monitored and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes for parameters that are monitored continuously. Amount of iron in the spent pickle liquor shall be determined for each run by sampling the liquor every 15 minutes and analyzing a composite of the samples. The permittee shall determine the compliant monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration per paragraph a.2. of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish

compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

2. During this performance test, the permittee may establish an alternative concentration standard if the permittee can demonstrate to the Administrator's satisfaction that the plant cannot meet a concentration limitation for Cl_2 of 6 ppmv when operated within its design parameters. The alternative concentration standard shall be established through performance testing while the plant is operated at maximum design temperature and with the minimum proportion of excess air that allows production of iron oxide of acceptable quality while measuring the Cl_2 concentration in the process exhaust gas. The measured concentration shall be the concentration standard for that plant.

d. *Test methods.*

1. The following test methods in appendix A of 40 CFR part 60 shall be used to determine compliance with Section 8.1.2. of this permit:

i. Method 1, to determine the number and location of sampling points, with the exception that no traverse point shall be within one inch of the stack or duct wall;

ii. Method 2, to determine gas velocity and volumetric flow rate;

iii. Method 3, to determine the molecular weight of the stack gas;

iv. Method 4, to determine the moisture content of the stack gas; and

v. Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources—Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere, and also to determine the concentration of Cl_2 discharged to the atmosphere from acid regeneration plants. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (30 dry standard cubic feet). The concentrations of HCl and Cl_2 shall be calculated for each run as follows:

C_{HCl}(ppmv) = 0.659 C_{HCl}(mg/dscm), and C_{C12}(ppmv) = 0.339 C_{C12}(mg/dscm),

where C(ppmv) is concentration in ppmv and C(mg/dscm) is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

2. The permittee may use equivalent alternative measurement methods approved by the Administrator.

[40 C.F.R. § 63.1161 and 45CSR34]

8.3. Monitoring requirements.

8.3.1. a. The permittee shall:

1. Conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in Section 8.2. of this permit. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2

1/2 years or twice per Title V permit term. If any performance test shows that the HCl emission limitation is being exceeded, then the owner or operator is in violation of the emission limit.

2. In addition to conducting performance tests, if a wet scrubber is used as the emission control device, install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in Section 8.1.4.b. of this permit.

3. If an emission control device other than a wet scrubber is used, install, operate, and maintain systems for the measurement and recording of the appropriate operating parameters.

4. Failure to record each of the operating parameters listed in Section 8.3.1.a.2. of this permit is a violation of the monitoring requirements of this subpart.

5. Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

6. The permittee may develop and implement alternative monitoring requirements subject to approval by the Administrator.

b. The permittee shall also install, operate, and maintain systems for the measurement and recording of the:

1. Process offgas temperature, which shall be monitored continuously and recorded at least once every shift while the facility is operating in production mode; and

2. Parameters from which proportion of excess air is determined. Proportion of excess air shall be determined by a combination of total air flow rate, fuel flow rate, spent pickle liquor addition rate, and amount of iron in the spent pickle liquor, or by any other combination of parameters approved by the Administrator in accordance with 40 C.F.R. §63.8(f). Proportion of excess air shall be determined and recorded at least once every shift while the plant is operating in production mode.

3. Each monitoring device must be certified by the manufacturer to be accurate to within 5 percent and must be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

4. Operation of the plant with the process offgas temperature lower than the value established during performance testing or with the proportion of excess air greater than the value established during performance testing is a violation of the operational standard specified in Section 8.1.3.a. of this permit.

c. The owner or operator of an affected hydrochloric acid storage vessel shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

[40 C.F.R. § 63.1162 and 45CSR34]

8.4. Reporting requirements.

8.4.1. a. *Notification of performance test.* As required by 40 C.F.R. §63.9(e), the permittee shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under 40 C.F.R. §63.7(c) and, if requested by the Administrator, to have an observer present during the test.

b. *Notification of compliance status.* The permittee shall submit a notification of compliance status as required by 40 C.F.R. §63.9(h).

[40 C.F.R. §§63.1163(d) and (e)]

8.4.2. a. *Reporting results of performance tests.* As required by 40 C.F.R. §63.10(d)(2), the permittee shall report the results of any performance test as part of the notification of compliance status required in Section 8.4.1.b. of this permit

b. *Periodic startup, shutdown, and malfunction reports.* 40 C.F.R. §63.6(e) requires the permittee to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.

1. *Plan.* As required by 40 C.F.R. §63.6(e)(3), the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

2. *Reports.* As required by 40 C.F.R §63.10(d)(5)(i), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31; and

3. *Immediate Reports.* Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 C.F.R. §63.10(d)(5)(ii).

[40 C.F.R. § 63.1164 and 45CSR34]

8.5. Recordkeeping requirements.

8.5.1. a. *General recordkeeping requirements.* As required by 40 C.F.R. §63.10(b)(2), the permittee shall maintain records for 5 years from the date of each record of:

1. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

2. The occurrence and duration of each malfunction of the air pollution control equipment;

3. All maintenance performed on the air pollution control equipment;

4. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

5. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 C.F.R. §63.10(b)(2)(v));

6. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

7. All results of initial or subsequent performance tests;

8. If the permittee has been granted a waiver from recordkeeping or reporting requirements under 40 C.F.R. §63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements;

9. If the permittee has been granted a waiver from the initial performance test under 40 C.F.R. §63.7(h), a copy of the full request and the Administrator's approval or disapproval;

10. All documentation supporting initial notifications and notifications of compliance status required by 40 C.F.R. §63.9; and

11. Records of any applicability determination, including supporting analyses.

b. *Subpart CCC records.*

1. In addition to the general records required by Section 8.5.1.a. of this section, the permittee shall maintain records for 5 years from the date of each record of:

   i. Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used;

   ii. Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and

   iii. Each maintenance inspection and repair, replacement, or other corrective action.

2. The owner or operator of an acid regeneration plant shall also maintain records for 5 years from the date of each record of process offgas temperature and parameters that determine proportion of excess air.

3. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Administrator for a period of 5 years after each revision to the plan.

c. *Recent records.* General records and subpart CCC records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

[40 C.F.R. § 63.1165 and 45CSR34]

8.6. Compliance Plan

8.6.1. None